

Palmer, Janet L.  
Page 1 of 1

Dear DOE: <sup>BECAUSE OF THIS, I CONSIDER</sup>  
~~MOVING OUT OF MY HOME, AND~~  
~~OUT OF LIVERMORE.~~

Here is my comment on the draft Site-Wide Environmental Impact Statement on Livermore Lab operations over the next ten years. The SWEIS calls for major increases in nuclear weapons design and manufacture. New plutonium activities include: raising the inventory from 1,540 pounds to 3,300 pounds; tripling the amount "at risk" at one time; creating prototype bomb cores for a new "Modern Pit Facility;" fissioning plutonium in the NIF mega-laser; and, vaporizing plutonium oxide on-site to separate isotopes. The SWEIS also reveals plans to increase the "at risk" limit for radioactive tritium 10-fold.

**To:**

**Mr. Tom Grim**  
**DOE, NNSA, L-293**  
**7000 East Avenue**  
**Livermore, CA 94550**

**I AM COUNTING ON YOU!**

1/01.01 I oppose these actions in the SWEIS that will  
2/04.01 increase nuclear proliferation and damage our  
3/07.01 environment. I call on you to analyze conversion  
of the Lab to peaceful purposes as an alternative.

Signed: Janet L. Palmer

Address: 156 Barber St.  
Livermore, CA 94550

Pardee, Thomas and Marjorie  
Page 1 of 1

Thomas and Marjorie Pardee  
1159 Princeton Place  
Davis, CA 95616

Mr. Tom Grim  
DOE  
NNSA, L-293  
7000 East Ave  
Livermore, CA 94550  
Fax: (925) 422-1776

May 24, 2004

Dear Mr. Grim,

1/04.01 We would like to state our objections to the plan to increase the handling of plutonium and the development of nuclear weapons at Livermore Lab

2/02.01 Based on the draft site-wide Environmental Impact Statement on the labs planned operations for the next ten years the limit for plutonium will more than double and a project is to be revived to heat and vaporize plutonium to separate our isotopes. The lab will be made into a testing site for new technologies to manufacture plutonium pits, directed towards establishing a new Modern Pit Facility to produce nuclear weapons - contrary to public and Congressional intent. We wish to state that we, too, oppose this use of the lab for weapons development research.

3/26.01, 26.03 Adding plutonium, highly-enriched uranium and lithium hydride to experiments in the National Ignition Facility megalaser will serve weapons development and will endanger both lab personnel and the environment we share. Manufacture of tritium targets will increase the risk of accidents, spills and releases for which the lab already has a history, and it will increase the amount of airborne radioactivity emanating from the lab. Collocating an advanced bio-warfare agent facility explicitly advances weapons research at the lab and poses additional risk to lab personnel, the public and the environment. We wish to state that we oppose these plans for weapons research and risk to the environment, the community and the people who work in the lab.

4/39.01 Furthermore, we oppose plans to develop diagnostics for underground nuclear tests because it facilitates unrestrained nuclear testing at large.

Thank you for including these comments in your review of the 10 year plans of the lab and thank you for your effort to keep the lab directed only to peaceful and environmentally safe scientific research.

Sincerely,

Thomas Pardee Marjorie Pardee  
Thomas Pardee Marjorie Pardee

SW/SPEIS  
PUBLIC INVOLVEMENT  
DOCUMENT 843

Perdomo, Cristina  
Page 1 of 4

May 26, 2004

Mr. Thomas Grim, L-293  
U.S. Department of Energy,  
National Nuclear Security Administration  
Livermore Site Office, SWEIS Document Manager  
7000 East Avenue  
Livermore, CA 94550-9234

Fax: (925) 422-1776  
Email: tom.grim@oak.doe.gov

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL).

Dear Mr. Grim:

1/31.04

Through this letter we are expressing our deep concern with the health and environmental risks posed by the expanded nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL) into the indefinite future. We appreciate your focused attention to this matter. Below, we have outlined a number of specific concerns that, taken cumulatively, lead us to the conclusion that the Site Wide Environmental Impact Statement (SWEIS) for the continuing operation of LLNL is so deficient in information and analysis that it must be fixed and re-circulated in draft form. This would allow the community, the regulators, and the legislators to have the opportunity to evaluate the new information that is requested in these comments. Our specific concerns are:

2/08.02

1. The same day of the public hearings for the SWEIS, April 27, 2004, the Congressional Subcommittee on National Security, Emerging Threats, and International Relations for the Committee on Government Reform held a hearing on the security of nuclear materials. The hearing highlighted potentially insurmountable problems with plutonium and highly enriched uranium at certain Department of Energy (DOE) sites, with a focus on the vulnerability of nuclear materials storage at LLNL. On May 7, 2004, Energy Secretary Spencer Abraham delivered a speech on the deficiencies in the security of nuclear materials at LLNL and other DOE sites. The Energy Secretary made a commitment to consider removing the special nuclear materials at LLNL by 2005. This recent acknowledgement by the DOE that security at LLNL is questionable makes it imperative that the SWEIS evaluate an alternative that would remove all special nuclear materials from LLNL. These acknowledgements make this not only a reasonable option, but one that should be evaluated because it is a foreseeable outcome within the next decade at LLNL.

2. Instead of reducing the amount of special nuclear materials on-site at LLNL, this plan proposes to more than double the limit for plutonium at Livermore Lab from 1,540 pounds to 3,300 pounds. Additionally, under the Proposed Action, the administrative

Perdomo, Cristina  
Page 2 of 4

2/08.02  
cont.

limit for highly enriched uranium in Building 239 would increase from 55 pounds to 110 pounds. Seven million people live in surrounding areas, and residences are built right up to the fence. Plutonium is difficult to store safely because, in certain forms, it can spontaneously ignite and burn. Moreover, it poses a criticality risk when significant quantities are stored in close proximity. The amount of plutonium proposed for LLNL is sufficient to make more than 300 nuclear bombs. Because of the health risks, the proliferation dangers, storage hazards, and very serious security concerns, we believe it is irresponsible to store plutonium, highly enriched uranium and tritium at LLNL. We are calling upon the DOE to de-inventory the plutonium, highly enriched uranium and tritium stocks at LLNL rather than to increase them.

3/34.01  
4/33.01,  
25.01

3. The SWEIS proposes to increase the at-risk limits for tritium ten fold, from just over 3 grams to 30 grams. The SWEIS proposes to increase the at-risk limit for plutonium from 44 pounds to 132 pounds. We believe it is unsafe to increase the amount of tritium and plutonium that can be "in process" in one room at one time. LLNL has a history of criticality violations with plutonium and releases of both tritium and plutonium, making it evident that these amounts should be decreased, rather than increased.

5/27.01

4. This plan will revive a project that was canceled more than 10 years ago because it was dangerous and unnecessary. The project was called Plutonium - Atomic Vapor Laser Isotope Separation (AVLIS). Now it is called the "Integrated Technology Project" (ITP) and the "Advanced Materials Program" (AMP). This is a scheme to heat and vaporize plutonium and then shoot multiple laser beams through the vapor to separate out plutonium isotopes. The ITP / AMP is a health risk and a nuclear proliferation nightmare. We believe the ITP and AMP work should be cancelled as the Plutonium AVLIS was cancelled in 1990 - this time permanently.

6/37.01

5. This plan makes Livermore Lab the place to test new manufacturing technologies for producing plutonium pits for nuclear weapons. A pit is the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion. DOE says these new technologies will then be used in a new bomb factory, called the Modern Pit Facility (MPF). Public and Congressional opposition to the MPF has caused its delay this year. The Livermore Lab plutonium pit program goes full-speed ahead in the wrong direction. It will enable the MPF and production of 150 - 450 plutonium bomb cores annually, with the ability to run double shifts and produce 900 cores per year. This production capability would approximate the combined nuclear arsenals of France and China - each year. We call upon the DOE to halt all work on plutonium pit production technologies at Livermore Lab. We believe it is premature for the DOE to spend taxpayer dollars on this technology and the prudent and reasonable outcome is to delay or cancel this project.

7/26.01  
8/26.03

6. This plan will add plutonium, highly-enriched uranium and large quantities of lithium hydride to experiments in the National Ignition Facility mega-laser when it is completed at Livermore Lab. Using these materials in the NIF will increase its usefulness for nuclear weapons development, including for the design of new types of nuclear weapons. It will also make the NIF more hazardous to workers and the environment. This is not

Perdomo, Cristina  
Page 3 of 4

7/26.01 8/26.03 cont.	only dangerous to people's health and safety, and a proliferation risk, but it is sure to result in an inordinate cost to the taxpayer. No cost estimate associated with this proposal has been released to date. We ask the DOE to cancel these dangerous, polluting, proliferation-provocative and unnecessary new experiments proposed for the NIF.
9/26.04	7. The SWEIS reveals plans to manufacture tritium targets at LLNL. The tritium-filled targets are the radioactive fuel pellets that the NIF's 192 laser beams will "shoot" in an attempt to create a thermonuclear explosion. Producing the targets will increase the amount of tritium that is used in any one room at Livermore Lab from the current limit of just over 3 grams to 30 grams - nearly 10-fold more. In the mid-1990's, LLNL stated that target fabrication was to occur off-site because of LLNL's proximity to large populations. Livermore Lab has a history of tritium accidents, spills and releases. The NIF will increase the amount of airborne radioactivity emanating from LLNL. We call on DOE to cancel plans to manufacture tritium targets for NIF at Livermore Lab. Further, we urge cancellation of the NIF megalaser. Cancellation of NIF is a reasonable alternative that should be fully analyzed in the SWEIS.
10/39.01	8. This plan also calls for Livermore Lab to develop diagnostics to "enhance" the nation's readiness to conduct full-scale underground nuclear tests. This is a dangerous step back to the days of unrestrained nuclear testing. All work at LLNL to reduce the time it takes to conduct a full-scale underground nuclear test should be terminated immediately.
11/35.01	9. This plan mixes bugs and bombs at Livermore. It calls for collocating an advanced bio-warfare agent facility (BSL-3) with nuclear weapons activities in a classified area at Livermore Lab. The plan proposes genetic modification and aerosolization (spraying) with live anthrax, plague and other deadly pathogens. This could weaken the international biological weapons treaty -- and it poses a risk to workers, the public and the environment here in the Bay Area. The draft SWEIS does not adequately describe these programs, or the unique security, health and environmental hazards they present. Construction should be halted on the portable BSL-3 facility. All plans to conduct advanced bio-warfare agent (BSL-3) research on site at LLNL should be terminated.
12/14.01	10. There are 108 buildings identified at LLNL as having potential seismic deficiencies relative to current codes. The SWEIS should include a complete list of these buildings and an accounting of the ones that house or may house hazardous, radiological and biological research materials. LLNL is located within 1 kilometer of two significant earthquake faults, including the Las Positas Fault Zone less than 200 feet from the LLNL boundary. How can we mitigate harm done from an earthquake that damages these buildings before they are brought up to code? We urge the Livermore Lab to stop any work with hazardous, radioactive or biological substances that may be occurring in any building that does not comply with federal standards.
13/22.01	11. A contractor will be paid to package and ship more than 1,000 drums of transuranic and mixed transuranic waste to the WIPP dump in New Mexico, yet the SWEIS says this is exempt from environmental review. This work in its entirety must be included in the review.

Perdomo, Cristina  
Page 4 of 4

14/20.05	12. The DOE does not acknowledge in the SWEIS that the double-walled shipping containers described in the document may be replaced by less health - protective single-lined containers. We believe that no waste should be shipped in single-walled containers and the SWEIS should provide a guarantee to that effect.
15/01.01	13. The Purpose and Need statement in the SWEIS relies heavily upon the US Nuclear Posture Review, which calls for an aggressive modernization and manufacturing base within the US nuclear weapons complex. This stands in stark contrast to the binding legal mandate to shift "from developing and producing new weapons designs to dismantling obsolete weapons and maintaining a smaller weapons arsenal". We believe a revised Purpose and Need statement should accurately reflect the Livermore Lab's legal responsibility with regard to US law, including US obligations under the nuclear Non-Proliferation Treaty (NPT).
16/07.01	Further, the Purpose and Need statement in the SWEIS almost completely omits LLNL's important role in civilian science research. This omission fatally flaws the alternatives analysis in the SWEIS by neglecting to consider the expanded role that civilian science programs at the LLNL could play in the next decade.
	The alternatives analysis should be revised to consider LLNL's role in light of the commitments in the NPT and the Livermore Lab's civilian science mission as well as the compelling case for removing special nuclear materials (i.e., plutonium and highly enriched uranium) from the LLNL site.
	Sincerely, Cristina Perdomo
	--
	"A patriot is not a weapon. A patriot is the one who wrestles for the soul of her country as she wrestles for her own being" (Adrienne Rich).
	"Un patriota no es un arma. Un patriota es aquel que lucha por el alma de su país al igual que lucha por su propio bien" (Adrienne Rich).

Perry, Diana  
Page 1 of 1

-----Original Message-----

**From:** Diana Perry [mailto:dianasperry@yahoo.com]  
**Sent:** Tuesday, April 13, 2004 11:59 AM  
**To:** tom.grim@oak.doe.gov  
**Subject:** Increase in nuclear weapon activities

Mr. Grim,

1/04.01

The plan to expand nuclear weapon activities at the Lawrence Livermore Lab is a very bad idea: in fact, in today's world, the last thing anyone should be doing is to expand nuclear weapons period. It is especially alarming to hear that the amount of plutonium at Livermore Labs would be double the present amount. I also strongly object to the plan to install an advanced Bio-Warfare Agent Facility at the lab. These plans for expansion are beyond dangerous; they are insane. Please urge the Department of Energy to formulate safer plans for Lawrence Livermore, a site near the highly populated Bay Area which would be disastrously affected in the case of a lab accident.

Diana Perry, Berkeley, California

Physicians for Social Responsibility, Robert M. Gould, MD, President  
Page 1 of 5



Physicians for Social Responsibility  
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May 26, 2004

Mr. Thomas Grim, L-293  
U.S. Department of Energy,  
National Nuclear Security Administration  
Livermore Site Office, SWEIS Document Manager  
7000 East Avenue  
Livermore, CA 94550-9234

Fax: (925) 422-1776  
Email: tom.grim@oak.doe.gov

RE: Comments on the Department of Energy's Site-Wide Environmental Impact Statement (SWEIS) for Continued Operations at Lawrence Livermore National Laboratory (LLNL).

Dear Mr. Grim:

1/31.04

I am writing, on behalf of the approximately 2,000 members of the SF-Bay Area Chapter of Physicians for Social Responsibility (PSR), to express our deep concerns regarding the profound health and environmental risks posed by the plans to expand the nuclear weapons mission for the Lawrence Livermore National Laboratory (LLNL) into the indefinite future. Along with many other professional and community organizations, we believe that the Site Wide Environmental Impact Statement (SWEIS) for the continuing operation of LLNL is remarkably deficient in information and analysis, and that consequently it should be corrected and re-circulated in draft form. This would allow the community, the regulators, and the legislators to have the opportunity to evaluate the new information that is requested in the following comments. Issues we would appreciate being addressed include:

2/08.02

1. On the same day of the public hearings for the SWEIS, April 27, 2004, the Congressional Subcommittee on National Security, Emerging Threats, and International Relations for the Committee on Government Reform held a hearing on the security of nuclear materials. The hearing highlighted potentially insurmountable problems with plutonium and highly enriched uranium at certain Department of Energy (DOE) sites, with a focus on the vulnerability of nuclear materials storage at LLNL. On May 7, 2004, Energy Secretary Spencer Abraham delivered a speech on the deficiencies in the security of nuclear materials at LLNL and other DOE sites. The Energy Secretary made a commitment to consider removing the special nuclear materials at LLNL by 2005. This recent acknowledgement by the DOE that security at LLNL is questionable makes it imperative that the SWEIS evaluate an alternative that would remove all special nuclear materials from LLNL. These acknowledgements make this

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SW/SPEIS  
PUBLIC INVOLVEMENT  
DOCUMENT 1038

Physicians for Social Responsibility, Robert M. Gould, MD, President  
Page 2 of 5

2/08.02 cont.	<p>not only a reasonable option, but one that should be evaluated because it is a foreseeable outcome within the next decade at LLNL.</p> <p>2. Instead of reducing the amount of special nuclear materials on-site at LLNL, the current proposal calls for more than doubling the limit for plutonium at Livermore Lab from 1,540 pounds to 3,300 pounds. In addition, under the Proposed Action, the administrative limit for highly enriched uranium in Building 239 would increase from 55 pounds to 110 pounds. This increases what is already an unacceptable risk to those who live in close proximity to LLNL, as well as to the approximately seven million people who live in areas surrounding Livermore. This risk is attributable to the fact that plutonium is difficult to store safely because it can spontaneously ignite and burn when present in certain forms; in addition, plutonium poses a criticality risk when significant quantities are stored in close proximity. The amount of plutonium proposed for LLNL is sufficient to make more than 300 nuclear bombs. Because of the health risks, the proliferation dangers, storage hazards, and very serious security concerns, we believe it is irresponsible to store plutonium, highly enriched uranium and tritium at LLNL. As such, we are calling upon the DOE to de-inventory the plutonium, highly enriched uranium and tritium stocks at LLNL, rather than to increase them per the present proposal.</p>
3/34.01 4/33.01, 25.01	<p>3. Related to the above, the SWEIS proposes to increase the at-risk limits for tritium ten-fold, from just over 3 grams to 30 grams, and to increase the at-risk limit for plutonium from 44 pounds to 132 pounds. We believe it is unsafe to increase the amount of tritium and plutonium that can be "in process" in one room at one time. This is because LLNL has a history of criticality violations with plutonium and releases of both tritium and plutonium, underscoring our position that these amounts should be decreased, rather than increased.</p>
5/27.01	<p>4. We are also concerned that the current proposal would essentially revive the Plutonium - Atomic Vapor Laser Isotope Separation (AVLIS) project that was canceled more than 10 years ago as being dangerous and unnecessary. In its apparent new manifestation as the "Integrated Technology Project" (ITP) and the "Advanced Materials Program" (AMP), this revamped project proposes to heat and vaporize plutonium prior to shooting multiple laser beams through the vapor to separate out plutonium isotopes. We believe that the proposed ITP /AMP, posing a significant health and weapons proliferation risk, should be cancelled permanently.</p>
6/37.01	<p>5. PSR also opposes plans to make Livermore Lab the place to test new manufacturing technologies for producing plutonium pits (the softball-sized piece of plutonium that sits inside a modern nuclear weapon and triggers its thermonuclear explosion), which we believe directly opens up a new dangerous era of nuclear weapons development. DOE says these new technologies will then be used in a new bomb factory, called the Modern Pit Facility (MPF). Public and Congressional opposition to the MPF has caused its delay this year. The Livermore Lab plutonium pit program goes full-speed ahead in the wrong direction, enabling the development of the MPF and attendant production of 150 - 450 plutonium bomb cores annually, with the ability to run double shifts and produce 900 cores per year. This production capability would approximate the combined nuclear arsenals of France and China - each year. We call upon the DOE to halt all work on plutonium pit production technologies</p>

Physicians for Social Responsibility, Robert M. Gould, MD, President  
Page 3 of 5

6/37.01 cont.	<p>at Livermore Lab. We believe it is premature for the DOE to spend taxpayer dollars on this technology and the prudent and reasonable outcome is to delay or cancel this project.</p>
7/26.01 8/26.03	<p>6. This plan will add plutonium, highly-enriched uranium and large quantities of lithium hydride to experiments in the National Ignition Facility mega-laser when it is completed at Livermore Lab. Using these materials in the NIF will increase its usefulness for nuclear weapons development, including for the design of new types of nuclear weapons. It will also make the NIF more hazardous to workers and the environment. This is not only dangerous to people's health and safety, and a proliferation risk, but it is sure to result in an inordinate cost to the taxpayer. No cost estimate associated with this proposal has been released to date. We ask the DOE to cancel these dangerous, polluting, proliferation-provocative and unnecessary new experiments proposed for the NIF.</p>
9/26.04	<p>7. The SWEIS reveals plans to manufacture tritium targets at LLNL. The tritium-filled targets are the radioactive fuel pellets that the NIF's 192 laser beams will "shoot" in an attempt to create a thermonuclear explosion. Producing the targets will increase the amount of tritium that is used in any one room at Livermore Lab from the current limit of just over 3 grams to 30 grams - nearly 10-fold more. In the mid-1990's, LLNL stated that target fabrication was to occur off-site because of LLNL's proximity to large populations. Livermore Lab has a history of tritium accidents, spills and releases. The NIF will increase the amount of airborne radioactivity emanating from LLNL. We call on DOE to cancel plans to manufacture tritium targets for NIF at Livermore Lab. In addition, we urge cancellation of the NIF megalaser as a reasonable alternative that should be fully analyzed in the SWEIS.</p>
10/39.01	<p>8. This plan also calls for Livermore Lab to develop diagnostics to "enhance" the nation's readiness to conduct full-scale underground nuclear tests. This is a dangerous step back to the days of unrestrained nuclear testing. We believe that all work at LLNL to reduce the time it takes to conduct a full-scale underground nuclear test should be terminated immediately.</p>
11/35.01	<p>9. PSR is strongly opposed to plans for integrating an advanced bio-warfare agent facility (BSL-3) with nuclear weapons activities in a classified area at Livermore Lab. The plan proposes genetic modification and aerosolization (spraying) with live anthrax, plague and other deadly pathogens. While posing a risk to workers, the public and the environment in the Bay Area, the inherently ambiguous nature of such work in the midst of a nuclear weapons facility devoid of transparency threatens to undermine the Biological Weapons Convention and to initiate a new biological arms race. The draft SWEIS does not adequately describe these programs, or the unique security, health and environmental hazards they present. Construction should be halted on the portable BSL-3 facility. All plans to conduct advanced bio-warfare agent (BSL-3) research on site at LLNL should be terminated.</p>

Physicians for Social Responsibility, Robert M. Gould, MD, President  
Page 4 of 5


- 12/14.01 10. There are 108 buildings identified at LLNL as having potential seismic deficiencies relative to current codes. The SWEIS should include a complete list of these buildings and an accounting of the ones that house or may house hazardous, radiological and biological research materials. LLNL is located within 1 kilometer of two significant earthquake faults, including the Las Positas Fault Zone less than 200 feet from the LLNL boundary. The SWEIS needs to address how to mitigate harm done from an earthquake that damages these buildings before they are brought up to code, and LLNL should to stop any work with hazardous, radioactive or biological substances that may be occurring in any building that does not comply with federal standards.
- 13/22.01 11. A contractor will be paid to package and ship more than 1,000 drums of transuranic and mixed transuranic waste to the WIPP dump in New Mexico, yet the SWEIS says this is exempt from environmental review. Because of the potential health and environmental hazards posed by this work, its entire scope should be included in the review.
- 14/20.05 12. The DOE does not acknowledge in the SWEIS that the double-walled shipping containers described in the document may be replaced by less health - protective single-lined containers. We believe that no waste should be shipped in single-walled containers and the SWEIS should provide a guarantee to that effect.
- 15/01.01 13. The Purpose and Need statement in the SWEIS relies heavily upon the US Nuclear Posture Review, which calls for an aggressive modernization and manufacturing base within the US nuclear weapons complex. This stands in stark contrast to the binding legal mandate to shift "from developing and producing new weapons designs to dismantling obsolete weapons and maintaining a smaller weapons arsenal". We believe a revised Purpose and Need statement should accurately reflect the Livermore Lab's legal responsibility with regard to US law, including US obligations under Article VI of the Nuclear Non-Proliferation Treaty (NPT). In addition, the Purpose and Need statement in the SWEIS almost completely omits LLNL's important role in civilian science research. This omission flaws the alternatives analysis in the SWEIS by neglecting to consider the expanded role that civilian science programs at the LLNL could play in the next decade, particularly given the significant international health and environmental threats posed by unfolding global climate change.
- 16/07.01

Physicians for Social Responsibility, Robert M. Gould, MD, President  
Page 5 of 5

16/07.01  
cont.

As such, PSR believes that the alternatives analysis should be revised to consider LLNL's role in light of the commitments in the NPT and the Livermore Lab's civilian science mission as well as the compelling case for removing special nuclear materials (i.e., plutonium and highly enriched uranium) from the LLNL site.

Sincerely,

  
Robert M. Gould, MD  
President  
San Francisco-Bay Area Chapter  
Physicians for Social Responsibility

Immediate Past-President  
Physicians for Social Responsibility (National)

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